

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**DAKOTA BURCHARD,**

**Plaintiff,**

**v.**

**CORECIVIC OF TENNESSEE, LLC,  
TROUSDALE COUNTY, TENNESSEE,  
LYBRUNCA COCKRELL, CORTNEY  
CRAWFORD, MARTIN FRINK,  
JERMARIS PORTER, and JANE  
WRIGHT,**

**Defendants.**

**Civil Action Number 3:23-CV-455  
District Judge William L. Campbell, Jr.  
Magistrate Judge Alistair E. Newbern  
Jury Demand**

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**JOINT MOTION TO ENTER AGREED PROTECTIVE ORDER**

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Plaintiff Dakota Burchard and Defendants CoreCivic of Tennessee, LLC, Trousdale County, Tennessee, Lybrunca Cockrell, Cortney Crawford, Martin Frink, and Jermaris Porter respectfully move the Court to enter an Agreed Protective Order, attached to this Motion. In support of this Motion, these parties state that entry of the Agreed Protective Order will allow for the protection of confidential information produced by the parties and by third parties, as defined and described in the attached Agreed Protective Order.

Respectfully submitted,

/s/ Erin Palmer Polly

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*Defendants CoreCivic of Tennessee, LLC,  
Trousdale County, Tennessee, Lybrunca  
Cockrell, Cortney Crawford, Martin Frink,  
and Jermaris Porter*

**CERTIFICATE OF SERVICE**

I certify that a true and exact copy of the foregoing has been served upon Filing Users via the electronic filing system and on other counsel via U. S. Mail, first-class postage prepaid, this April 19, 2024, on the following:

Daniel A. Horwitz  
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/s/ Erin Palmer Polly